

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-10194-RCL
)	
ANTHONY BUCCI)	

**Government's Response to Defendant Bucci's Fourth Motion to
Amend Pretrial Conditions**

The United States of America, by and through Assistant United States Attorney John T. McNeil, respectfully submits this response to Defendant Bucci's fourth motion to amend his conditions of pretrial release (Docket No. 104). The government has substantial doubts as to the defendant's allegations of his family's financial distress, given that he has had funds to continue constructing a sizeable new home in Wakefield while he has been on home confinement and during his pretrial detention. Moreover, the financial distress claimed by the defendant is more likely to be alleviated by the sale of a that new structure, than by the rental his mother's condominium.

However, after conferring with the Pretrial Services Officer, and in light of the fact that the activities of the defendant are more readily monitored by law enforcement and pretrial services officers in the location he proposes to move, the government has no objection to moving the location of the defendant's home confinement to 26 Upland Road in Wakefield, Massachusetts, provided that all other terms of his home confinement are not altered and that

his mother, Rosemary K. Keefe, remain his third party custodian.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

Date: March 2, 2005

By: /s/ John T. McNeil
JOHN T. MCNEIL
Assistant U.S. Attorney